

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

DOCKET NO. 2003-326-C

IN RE:

Analysis of Continued Availability of)
Unbundled Local Switching for Mass Market)
Customers Pursuant to the Federal)
Communications Commission's Triennial)
Review Order)

**IDENTIFICATION OF INTERROGATORIES AND REQUESTS TO PRODUCE
TO WHICH PBT COMMUNICATIONS, INC. INTENDS TO OBJECT**

In an attempt to comply with the directive of the Public Service Commission of South Carolina ("Commission") to identify to BellSouth Telecommunications, Inc. ("BellSouth") not later than January 7, 2004, the numbered items of BellSouth's First Set of Interrogatories and First Requests for Production of Documents to which PBT Communications, Inc. ("PBT") plans to object or to which no response will be made, PBT respectfully submits the following. Responses, including objections where appropriate, will be provided to BellSouth not later than January 14, 2004.

By identifying the interrogatories and requests to which PBT believes it will object, PBT is not waiving any right it may have to object to other interrogatories and requests if, in the course of responding to the remaining interrogatories and requests, PBT deems an objection to be warranted.

PBT expects that it will object to answering or providing information in response to the interrogatories and requests for production of documents identified below:

INTERROGATORIES: 2(d) and 2(e); 6; 7; 15; 16; 17; 22-33; 43-44.

REQUESTS FOR THE PRODUCTION OF DOCUMENTS: 2-7.

Submitted By:

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January 7, 2004